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5 Attorney for Defendant
HOSEIN "MIKE" ABEDI

6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE EASTERN DISTRICT OF CALIFORNIA

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10 UNITED STATES OF AMERICA,) No. CR S 03 0467 GEB
11 Plaintiff,) STIPULATION & PROPOSED ORDER
12 v.) CONTINUING MOTIONS HEARING
13 HOSEIN "MIKE" ABEDI,) DATE
14 Defendant.)
15 _____)

16 It is hereby stipulated and agreed, by and between the defendant Hosein Abedi, by and
17 through his counsel, Timothy E. Warriner, and the United States, through its counsel, Assistant
18 United States Attorney Anne Pings, to vacate the previously set motions hearing date of January
26, 2007, and to set a new motions hearing date of February 9, 2007.

19 The defendant's brother has a similar case pending. Both defendants have motions to
20 transfer venue pending. Hosein Abedi has filed other pretrial motions which are also pending.
21 Counsel for both defendants and counsel for the government have met to discuss the possibility
22 of resolution by plea. Counsel needs additional time to discuss with Mr. Abedi the plea proposal,
23 and to consult with the client's immigration attorney concerning the consequences of the plea.
24 Therefore, it is requested by all counsel that the hearing date be moved to **February 9, 2007**.

25 The parties further stipulate that time should continue to be excluded under the Speedy
26 Trial Act, 18 U.S.C. § 3161(h)(8)(iv) (preparation of counsel) in that the ends of justice will be
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1 served by allowing defendant's counsel time to investigate a possible plea resolution.

2 Furthermore, time should continue to be excluded due to the pendency of motions.

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4 DATED: January 24, 2007 /s/ Timothy E. Warriner, Attorney for Hosein Abedi

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6 DATED: January 24, 2007 /s/ Anne Pings, Assistant US Attorney

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9 **IT IS SO ORDERED**

10 Dated: January 24, 2007

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13 GARLAND E. BURRELL, JR.
United States District Judge